

DEPARTMENT OF TRANSPORTATION  
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION

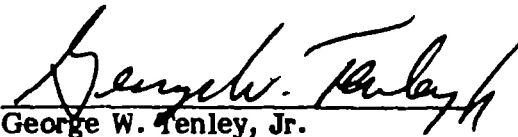
Int. No. 87-1-RSPA

INTERPRETATION

SOURCE: Illinois Department of Transportation.

**FACTS:** The Illinois DOT requests an interpretation to clarify the relationship between 49 CFR §§ 172.504(c) and 172.505 as applicable to the placarding of materials which are subject to the "Poison-Inhalation Hazard" shipping paper description. Section 172.504(c) excepts from placarding transport vehicles and freight containers that carry less than 1,000 pounds of a Table 2 hazardous material. However, § 172.504(c) additionally states: "This paragraph does not apply to . . . transport vehicles and freight containers subject to § 172.505". Section 172.505 states: "Each transport vehicle and freight container . . . must be placarded POISON . . . in addition to the placards required by § 172.504." The Illinois DOT interprets these regulations as excluding § 172.505 materials from the 1,000 pound placarding exception for transport vehicles and freight containers, and a material so defined must be placarded POISON pursuant to § 172.505, in addition to any other required hazard class placard. Illinois' first inquiry is whether its interpretation of §§ 172.504(c) and 172.505 is correct. Illinois specifically asks, what placards are necessary for a truck that carries one 55 gallon drum of flammable liquid hazardous material which also meets the poison-inhalation hazard definition. Lastly, Illinois inquires about placard requirements on a transport vehicle which carries the aforementioned 55 gallon drum and another hazardous material of a different Table 2 hazard class that is in excess of 1,000 pounds.

**INTERPRETATION:** The Illinois Department of Transportation's interpretation is correct. A shipment consisting, for example, of one drum (500 pounds) of a material classed as a flammable liquid which also poses an inhalation hazard, requires both FLAMMABLE and POISON placards under the provisions of § 172.504(a) and § 172.505, respectively. If, for example, a quantity of a corrosive material (e.g., 10 boxes weighing a total of 400 pounds) is added to the shipment then the vehicle must be placarded CORROSIVE, FLAMMABLE and POISON. The shipment is not eligible for the 1000 pound exception in § 172.504(c) because it includes a material that is toxic by inhalation. To allow shippers and carriers to placard shipments otherwise could cause emergency response errors, since emergency response personnel, seeing placards, are likely to presume that the placards reflect the hazards of all commodities in the transport vehicle or freight container. Under the provisions of § 172.504(b), the DANGEROUS placard may be substituted for either the CORROSIVE or FLAMMABLE placards, or both, but not for the POISON placard required by § 172.505.



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**Interpretation 87-1-RSPA: ABSTRACT**

Hazardous materials listed in § 172.504(c) that also meet the "Poison Inhalation" definition of section 172.203(k)(4), are not subject to the 1,000 pound placarding exemption contained in section 172.504(c). Additionally, a "Poison Inhalation" material, as defined by section 172.203(k)(4), must be placarded POISON pursuant to section 172.505, in addition to any other required hazard class placard.

**Interpretation 87-1-RSPA: KEY WORDS**

**Corrosive Material**

**Dual Placarding**

**Exception-Placarding**

**Placarding**

**Poison - Inhalation Hazard**

**Transport Vehicle**

**Interpretation 87-1-RSPA: SECTIONS AFFECTED**

**49 CFR 172.504(b)**

**49 CFR 172.504(c)**

**49 CFR 172.505**